



CHA

CHICAGO HOUSING
AUTHORITY™

FY20205 SENIOR DESIGNATED HOUSING PLAN



CHICAGO HOUSING AUTHORITY - FY2020-2025 SENIOR DESIGNATED HOUSING PLAN
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CHICAGO HOUSING AUTHORITY FY2020-FY2025 SENIOR DESIGNATED HOUSING PLAN

I. OVERVIEW: THE CHICAGO HOUSING AUTHORITY'S PROPOSAL TO AMEND ITS SENIOR DESIGNATED HOUSING PLAN (SDHP)

Currently, the Chicago Housing Authority (CHA) has 52 senior designated developments, comprised of 65 buildings. ~~(Ravenswood Senior Living has closed on funding as of December 2019). The~~ CHA seeks to extend the parameters of the designation established in FY2010 to increase leasing at senior designated properties with historic high vacancy rates and ensure accessible units continue to provide housing opportunities for residents with disabilities who may benefit from the features.

A. Reasons for Parameters of the FY2020~~5~~ Designation and Impacted Population

With the Department of Housing and Urban Development's (HUD's) approval, CHA lowered the minimum age from age 62 years to age 55 years in 2010 for admission into select senior designated properties. CHA seeks to maintain the minimum age of admission for senior designated properties for several reasons. First, some of CHA's senior designated properties have vacant units available for lease; second, the population of near elderly individuals continues to grow and ~~the~~ CHA would like to offer the opportunity for this population to live in senior designated properties. Per the latest Census Bureau American Community Survey data, the City of Chicago has demonstrated continued strong over 10% growth in its near-elderly population ~~over the past five years. At the same time, However,~~ the number of affordable housing units available in Chicago ~~has only has not kept up with the increased by less than 1% demand.~~

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In order to meet the demanding housing needs of an aging population, ~~the~~ CHA will strategically lease all of its available units, thus increasing the number of senior households ~~the~~ CHA is able to assist. By lowering the age eligibility for accessible units at select properties that have accessible units¹, ~~the~~ CHA will be able to more quickly house applicants and residents with disabilities who require the accessible features to accommodate their disabilities.

B. Providing Notice

~~The~~ CHA held a 30-day public comment period from 8 a.m. ~~January 24~~ September 18, 2020~~5~~ through 5 p.m. ~~October 17~~ February 20, 2020~~5~~.

~~The~~ CHA encourages comments during the public comment period on the Draft FY202~~5~~ Senior Designated Housing Plan from disability advocates and organizations such as Access Living, Equip for Equality, and the Mayor's Office for People with Disabilities. These stakeholders are also welcome to attend the public comment hearing during which ~~the~~ CHA will also garner input from residents and resident representatives, the Senior Housing Advisory Council, waitlist applicants and the general public on the Draft FY202~~5~~ Senior Designated Housing Plan. All stakeholders will be notified of the public comment period and hearings with advertisements in *Chicago Reader*, ~~and~~ *Chicago Sun-Times* ~~and~~ *Fin de Semana*.

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¹ While senior designated properties that are CHA-owned public housing and former public housing converted to RAD1 portfolios that include accessible units can offer lower age eligibility to applicants and residents with disabilities



who require the accessible features to accommodate their disabilities, other senior designated properties that are not CHA-owned do not provide for this policy. These properties include Independence Apartments, Northtown Apartments and Ravenswood Senior Living.



Finally, copies of the SDHP will be available during the public comment period at the following locations:

- CHA and HCV Administrative Offices 60 E Van Buren St
- Family Investment Center (FIC) 4859 S Wabash St
- Central Advisory Council Office 243 E 32nd St
- HCV Regional Office – South 10 W 35th St
- HCV Regional Office – West 1852 S Albany Av
- Erie Neighborhood House:
 - Little Village* 4225 W 25th St
 - West Town* 1347 W Erie St
- Spanish Coalition for Housing:
 - North Office* 1922 N Pulaski Rd
 - South Office* 1915 S Blue Island SE
 - Office* 9010 S Commercial
- www.thecha.org

Pending approval from the CHA Board of Commissioners, ~~the~~ CHA will submit the SDHP to the Department of Housing and Urban Development (HUD).

C. Approval

1. CHA Board of Commissioners – approval of the FY2020~~5~~ Senior Designated Housing Plan will be sought from the CHA Board of Commissioners on ~~March 17~~ November 18, 2020~~5~~. ~~The FY2015 Senior Designated Housing Plan was approved by the CHA Board of Commissioners on March 25, 2016.~~
2. HUD – The approved FY2020~~5~~ Senior Designated Housing Plan will be submitted to HUD for final authorization and will be valid until December 31, 20~~25~~30.



II. REASONS FOR AMENDMENTS TO THE ~~FY2020~~FY2025 SENIOR DESIGNATED HOUSING PLAN

With the implementation of the FY2000 Senior Designated Housing Plan (SDHP), CHA established properties for Chicago's elderly population. The commitment to providing seniors with viable low-income housing options was evidenced not only by the numerous agreements between HUD and the City of Chicago, but also by the establishment and subsequent renewal of CHA's Senior Designated Housing Plan.

In FY2010, ~~the~~ CHA sought to build upon these initial efforts by amending the parameters of the senior designation so that, moving forward, ~~the~~ CHA may lower the age requirement to 55 years at select buildings with high vacancies, as well as lease accessible senior units to applicants and residents with disabilities who require the accessibility features.

In FY2020, ~~the~~ CHA ~~seeks an extended extension of~~ the ~~Designation designation~~ and the previous amendments to the parameters of the SDHP.

In FY2025, CHA is seeking to again extend the designation as well as amend the occupancy rate threshold in which a reduced age senior building would be changed back to a 62+ age eligible property. The existing threshold is 98% occupancy for 12 consecutive months, and the proposed threshold is 96% occupancy for six consecutive months. The proposed occupancy rate and timeframe are in line with HUD standards for full occupancy, given normal turnover, and a more realistic threshold to demonstrate that the property could be changed back to a 62+ age eligible property.

A. Key reasons for extending the minimum age requirement at senior designated housing properties with high vacancy rates and modifying the implementation of the SDHP to return properties back to traditional senior building status:

1. Historically, several CHA senior designated properties have maintained high vacancy rates, meaning these buildings had less than 90% occupied units for six or more consecutive months. Though CHA increased marketing and leasing strategies, buildings maintained higher vacancy rates in some cases due to general market conditions. Reducing the minimum age of applicants to 55 years was identified as a strategy to lease these vacant units. Increased inquiries from the local near elderly population demonstrated an interested population that would benefit from the lower age and increased occupancy rates demonstrated the need to house the near elderly population.

The increasing need of the near elderly for low income housing is evident as described in Section I.A. Reasons for Parameters of the ~~FY2020~~FY2025 Designation and Impacted Population, for Chicago's population citywide.

B. Key reasons for extending the minimum age requirement for senior designated units with accessible features:

1. ~~The~~ CHA has rehabbed units throughout its senior designated properties to include units with accessible features per Federal regulations. Mobility accessible features include wider doorways for wheelchair access, handles on doors and cabinets that do not require grasping, all living spaces to have turning radii, higher toilet seats, lowered sinks and cabinets, a work space in the kitchen, and grab bars in bathrooms. Sensory accessible units have audio and visual alarms in the bedroom(s), living room, kitchen, and bathroom(s).



2. If there is a vacant unit with accessible features and all options in the Federal regulations for tenanting accessible units and the leasing policy are exhausted, the accessible unit is then leased to a non-disabled eligible applicant. The policy states that CHA will require the non-disabled applicant or resident to execute a lease addendum that requires them to move, at ~~the~~ CHA's expense, to a non-accessible unit within thirty calendar days of notice by ~~the~~ CHA if there is an eligible applicant or existing resident with disabilities who requires the

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accessibility features of the unit.

3.2 By maintaining the lower age requirement for select senior designated units with accessible features, ~~the~~ CHA can broaden the applicant base to include more applicants or residents with disabilities, including veterans, who require units with accessible features and avoid leasing accessible units to those who would not benefit from its features.



III. SUCCESSFUL IMPLEMENTATION OF THE ~~2020-2025~~ SENIOR DESIGNATED HOUSING PLAN

A. Policies that Support the FY2020~~5~~ Senior Designated Housing Plan

1. Policies ~~The~~ CHA will uphold the provisions of the Admissions and Continued Occupancy (ACOP) and Housing Choice Voucher Program Administrative Plan policies pertaining to seniors. These policies include: non-discrimination, reasonable accommodations ~~policy~~, and accessible units ~~policy~~ for traditional public housing as well as rental assistance demonstration (RAD) housing.

- a. Non-Discrimination

It is the policy of ~~the~~ CHA to comply with all equal opportunity requirements and nondiscrimination laws, rules, ordinances, and regulations imposed by local, state, and federal governments. Applicable Fair Housing and Equal Opportunity laws and regulations provides that no person shall, on the grounds of race, color, sex, age, familial status, religion, disability, national origin, ancestry, sexual orientation (including gender identity), marital status, housing status, order of protection status, military discharge status or source of income be excluded from participation in, or denied the benefits of, or be otherwise subjected to discrimination under the public housing program. The Age Discrimination Act of 1975 provides that no one shall be discriminated against on the basis of age and outlines certain rights of the elderly (24 CFR § 146). The provisions in federal, state and local laws regarding familial status do not apply to housing under any Federal or State program that the Secretary determines is specifically designed and operated to assist elderly persons, as defined in the State or Federal program. (24 CFR § 100.302)

Developers and third-party contractors must design and construct each development in accordance with the Fair Housing Act (FHA), Section 504 Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act (ADA), the Architectural Barriers Act of 1968 (ABA), and the Illinois Accessibility Code (IAC), as well as all other laws prohibiting discrimination on the basis of disability.

- b. Reasonable Accommodations Policy

CHA's Reasonable Accommodations Policy, outlined in Section I.B. of the Admissions and Continued Occupancy Policy as well as Section 2-II.C. of the Housing Choice Voucher Administrative Plan, confirms that CHA and its agents will make reasonable accommodations for residents and applicants if they or a family member have a disability and the individual requests and qualifies for a reasonable accommodation, unless it creates an undue financial or administrative burden on ~~the~~ CHA or requires the fundamental alteration or structural modification of a CHA housing unit. Reasonable accommodations include making modifications or changes to CHA's units, buildings, policies or procedures that will assist applicants and residents with a disability to take full advantage of and use CHA programs or programs operated by other agencies on CHA property.

Residents who request an accessible unit during relocation are offered an accessible unit once it is complete. Additionally, CHA established a preference in the ACOP for offering accessible units to qualified residents with disabilities before offering those units to other families. This preference applies as well in the Administrative Plan, Chapter 18 Policies for Rental Assistance Demonstration Properties. If CHA does offer an accessible or adaptable



unit to a non-disabled family, the family must sign a lease rider that establishes their willingness to move to another non-accessible unit within 30 days when a current resident or applicant with a disability needs the unit's accessible features.

c. Accessible Units Policy

1. Pursuant to eligibility requirements, ~~the~~CHA will offer available accessible units in the following order:
 - a. First, to a current qualified resident with a disability living in the same development that requires the special features of the vacant accessible unit and occupying a unit not having those accessibility features;
 - b. Second, to a current qualified resident with a disability residing in another development that requires the accessibility features of the vacant accessible unit;
 - c. Third, to an eligible, qualified applicant with disabilities on the wait-list who requires the accessibility features; and
 - d. Fourth, to a non-disabled eligible applicant or resident. ~~The~~CHA will require the applicant or resident to execute a lease addendum that requires them to move, at ~~the~~CHA's expense, to a non-accessible unit within 30 calendar days of notice by ~~the~~CHA if there is an eligible applicant or existing resident with disabilities who requires the accessibility features of the unit. **24 CFR § 8.27.**
2. ~~The~~CHA shall not prohibit a qualified eligible, disabled family from accepting a non-accessible unit for which the family is eligible, which may become available before an accessible unit. ~~The~~CHA may modify a non-accessible unit as needed as a reasonable accommodation, unless the modification would result in an undue financial and/or an administrative burden or would require the fundamental alteration or structural modification of a CHA housing unit.

B. Procedures for Implementation of the ~~FY2020~~FY2025 Senior Designated Housing Plan

1. Procedures for Implementation of Lowering the Age to 55 at Senior Designated Properties with high vacancy rates.²
 - a. ~~The~~CHA will continue to conduct ongoing review to determine what senior designated properties are considered high vacancy buildings. The foundational criteria for determining whether ~~the~~CHA will lower the age at a senior designated property is that the property must have an occupancy rate lower than 90% (determined by ~~the~~CHA's housing management system) for six months or longer. Additional factors contributing to occupancy rate will also be evaluated for those buildings who have experienced less than a 90% occupancy rate for six months or longer prior to deeming the property eligible for near elderly leasing. Additional factors include, but are not limited to, initiatives affecting leasing, such as

² While senior designated properties that are CHA-owned public housing and former public housing converted to RAD1 portfolios will be subject to review associated with vacancy rates and lowering eligibility to near elderly, those in which age eligibility is governed by external tenant selection plans are not subject to this vacancy rate evaluation procedure. These include Independence Apartments, Northtown Apartments, Ravenswood Senior Living and Rosenwald Courts Apartments.



maintenance and redevelopment work requiring floating unit vacancies in order to complete the work.

- b. When a building qualifies as a high vacancy building, ~~the~~ CHA will notify the property manager that ~~the~~ CHA is lowering the age for the head of household to 55 years old at that building. The Property Manager is responsible for updating all of their marketing materials and for informing potential applicants that anyone whose head of household is 55 years old and over is eligible to apply for a unit in that building.
 - 1. If the building increases its occupancy rate and maintains a ~~98~~6% occupancy rate for ~~12-six~~ months or more, then ~~the~~ CHA will evaluate and transition that building back to an elderly building and will no longer consider the building a high vacancy building. If a building is transitioned back to an elderly building, ~~the~~ CHA will no longer screen or offer units to anyone that is categorized as a near elderly applicant. Those near elderly applicants who are in screening at the time of transition will complete the screening cycle, remaining eligible to be housed at the previously near elderly property within that screening cycle *only*.
- c. The Occupancy Department will maintain a list of all properties that qualify as high vacancy buildings. All potential applicants will be notified of the senior designated properties where the head of household is required to be 62 and over and the senior designated properties where the head of household is required to be 55 and over.
- d. The Occupancy Department will accept applications for all high vacancy buildings from applicants whose head of household is 55 years old and over.

If a near elderly applicant is applying for a high vacancy building's waitlist, or following screening, is returned to a high vacancy building's waitlist and that building is then removed from the high vacancy status, that applicant will be notified of the age-eligibility change and their ability to select any other site-based waitlist for which they are eligible, which includes family and near elderly waitlists, or remain on the existing site-based waitlist for the now traditional elderly property in a deferred status until they become age-eligible.

- e. All applicants will be placed on the senior site-based waitlist according to original date of application.
- f. At high vacancy buildings, ~~the~~ CHA has established three hierarchic ranking preferences for the site-based waitlists based on age eligibility in an effort to preserve the senior designation of the buildings. Within each hierarchic preference, applicants will be placed on the site-based waitlist according to original date of application.

The hierarchal ranking preferences are listed, in order, below:



1. First₂ to applicants who are 62 and older
 2. Second₂ to applicants who are 60-61 years old
 3. Third₂ to applicants who are 55-59 years old
- g. ~~The~~CHA's Work Requirement will continue to apply to all applicants and residents who are between the ages of 17-54. For more information on the work requirement, please consult the ACOP and Administrative Plan, Chapter 18 Policies for Rental Assistance Demonstration Properties.
2. Procedures for Implementation of Lowering the Age for Accessible Units in Senior Designated Housing at All Buildings (regardless of vacancy rates)
- a. Applications for Units with Accessible Features³
- Select senior site-based waitlists will accept applications from heads of households who are 55 years old and older who require units with accessible features. These individuals will be given a non-ranked preference for the site-based waitlist in ~~the~~CHA's housing management system.
- b. In an effort to preserve the senior designation of the buildings, ~~the~~CHA follows the hierarchal ranking preferences as listed, in order, below for elderly and near elderly applicants who require units with accessible features:
1. First₂ to applicants who are 62 and older
 2. Second₂ to applicants who are 60-61 years old
 3. Third₂ to applicants who are 55-59 years old
- c. Vacant Units with Accessible Features
- Property managers at senior designated housing properties that have vacant units with accessible features will contact the Occupancy Department and let them know of the vacancy.
- ~~The~~CHA will follow the Accessible Unit Policy stated in Section III.A, subsection[a] and [b] of the Senior Designated Housing Plan to fill the vacant units prior to moving to the waitlist.
- If there is no one in housing who requires the unit with the accessible features, the Occupancy Department will send the Property Manager a waitlist with the names of the applicants who have been given the preference because of their need for the accessible unit. The Property Manager will then begin the screening

³ While senior designated properties that are CHA-owned public housing and former public housing converted to RAD1 portfolios that include accessible units can offer lower age eligibility to applicants and residents with disabilities who require the accessible features to accommodate their disabilities, other senior designated properties that are not CHA-owned do not provide for this policy. These properties include Independence Apartments, Northtown Apartments and Ravenswood Senior Living.



process.

If there is no one on the wait-list who requires the unit with accessible features, then ~~the~~ CHA will offer the units to a non-disabled eligible applicant or resident. Applicants or residents who lease an accessible unit and do not require the accessible features of the unit must sign a waiver that explains if a qualified disabled applicant or resident needs the accessible features of the leased unit, they must move.

d. Occupied Units with Accessible Features

~~The~~ CHA will follow the Accessible Unit Policy stated in Section III.A of the Senior Designated Housing Plan.

C. **Services to Support the FY2020~~5~~ Senior Designated Housing Plan**

CHA provides residents living in its senior designated properties with access to a variety of supportive services that support seniors' housing stability and quality of life through the Resident Service Coordination program or FamilyWorks program⁴. These services, which foster an environment conducive to aging in place that is welcoming to active seniors as well as those needing more support, will continue to be offered at the properties designated in this ~~FY2020~~ FY2025 Senior Designated Housing Plan, including:

1. Benefits Screening - Contracted service providers, whether assigned through the Resident Service Coordination program or FamilyWorks program, will link residents to local, State, and Federal benefits. The contracted service providers determine what services the resident needs; identify programs and benefits that are available to residents who meet the eligibility criteria; and follow up with each resident after the screening.
2. Opportunities for activity - Contracted service providers coordinate and provide a variety of activities, (e.g.; social, recreational, cultural, educational, health and wellness) for residents in the senior buildings and facilitate resident participation in several citywide events such as holiday celebrations.
3. Assessment and Referral - Upon request from a resident, or lease compliance and/or social service referral from management, contracted service providers offer to meet with the resident to understand their needs and make appropriate referrals and linkages to services. A resident's acceptance of the contracted service provider's offer of an assessment and referral(s) is completely voluntary and requires the resident's signed consent.

⁴ Resident Service Coordinators are stationed at CHA-owned senior designated properties within the public housing and former public housing converted to RAD1 portfolios. Resident Service Coordinators are also accessible for newly-developed RAD1 senior designated properties, Independence Apartments, Northtown Apartments and Ravenswood Senior Living. FamilyWorks service providers are available for senior designated buildings that are part of family public housing properties, Bridgeport Elderly, Hilliard Senior and Ida Platt Apartments. FamilyWorks service providers are also available for all senior designated properties in need of emergency clinical services.

Rosenwald Courts Apartments is not CHA-owned and does not receive CHA supportive services. Services are provided by the owner, Mercy Housing.



4. Distribute information - Contracted service providers regularly distribute a variety of informational flyers and packets designed to help residents understand pressing health and educational issues and learn about resources.
5. Well-being checks - Contracted service providers perform Senior Home Visit Assessments at all senior designated properties where CHA has contracted service providers. Additionally, in the case of weather-related emergencies, property management perform well-being checks on residents and provide access to requisite services, as necessary, with the assistance of contracted service providers.



IV. Definitions

1. Accessible - When used with respect to the design, construction, or alteration of housing and non-housing programs, 'accessible', means that the program or portion of the program when designed, constructed, altered or adapted, can be approached, entered, and used by individuals with disabilities.
2. Accessible Unit - A unit that is designed, constructed, altered or adapted to be in compliance with the Uniform Federal Accessibility Standards (UFAS) meets the minimum standards for compliance and is accessible.
3. Admission – The point in which the family becomes a public housing resident. The date used for this purpose is the effective date of the HUD Form 50058 for the family.
4. Applicant - An individual or a family that has applied for admission to CHA public housing.
5. CHA - The Chicago Housing Authority. The definition includes the CHA, its contractors, agents, and assignees.
6. Co-head of household - is an individual in the household who is equally responsible with the head of household for ensuring that the family fulfills all of its responsibilities under the program. A family can have only one co-head.
7. Disabled Family - A family whose head, spouse, or sole member is a person with disabilities. (Person with disabilities is defined later in this section.) The term includes two or more persons with disabilities living together, or one or more persons with disabilities living with one or more live-in aides. **24 CFR § 5.403**
8. Elderly Family - A family whose head, spouse, or sole member is at least 62 years of age. It may include two or more elderly persons living together, or one or more elderly persons living with one or more non-elderly persons, including live-in aides, determined to be essential to the care and well-being of the elderly person(s). An elderly family may include elderly persons with disabilities and other family members who are not elderly. **24 CFR § 5.403.**
9. Elderly Person - A person who is at least 62 years of age. **42 USC § 1437a(b)(3).**
10. Family - Two or more persons (with or without children) regularly living together, related by blood, marriage, adoption, guardianship, or operation of law who will live together in CHA housing; **OR** two or more persons who are not so related, but are regularly living together, and can verify shared income or resources.

The term family also includes: Elderly family (Definition #8), near elderly family (Definition #14) disabled family (Definition #7), displaced person, single person, the remaining member of a resident family, or a kinship care arrangement. Other persons, including members temporarily absent (e.g. a child temporarily placed in foster care or a student temporarily away at college), may be considered a part of the applicant family's household if they are living or will live regularly with the family. **24 CFR § 5.403.**

Live-in Aides may also be considered part of the household. However, live-in aides are not family members and have no rights as remaining family members.

Foster Care Arrangements include situations in which the family is caring for a foster adult(s) or child(ren) in their home who have been placed there by a public adult or child placement agency. These individuals are household members but are not family members and have no rights as



remaining family members because they do not have the legal capacity to remain in the home without an authorized remaining family member who is eligible to assume the role of the head of household.

For purposes of continued occupancy, the term family also includes the remaining member of a resident family with the capacity to execute a lease.

11. Head of the Household - The adult member of the family who is considered the head for purposes of determining income eligibility and rent. However, the income of the head of household, spouse, and each additional family member is included in determining rent. The head of household is responsible for ensuring that the family fulfills all of its responsibilities under the program, alone or in conjunction with a co-head or spouse. **24 CFR 5.504(b)**

- a. The family may designate any qualified family member as the head of household.
- b. The head of household must have the legal capacity to enter into a lease under state and local law. A minor who is emancipated under state law may be designated as head of household.

12. Household – Is a broader term for family that includes additional people who, with ~~the~~ CHA’s permission, live in a unit, such as live-in aides, foster children, and foster adults. However, household members are not family members and do not qualify as remaining family members.

13. Individual with Disabilities - The definition of an individual with disabilities is for the purpose of determining if an individual may obtain a reasonable accommodation or physical modification.

The Section 504 of the Rehabilitation Act (Section 504), Fair Housing Act and Americans with Disabilities Act (ADA) definitions of Individual with Handicaps and Qualified Individual with Disabilities are not the definitions used to determine program eligibility. Instead, use the definition from 42 USC 1437a(b)(3) of “Person with Disabilities” as defined separately (#16) in this section.

The terms ‘handicapped person’ or ‘person with handicaps’ as defined in Section 504 and the Fair Housing Act are synonymous with the term ‘individual with disabilities’.

- a. A physical or mental impairment that:
 - i. Substantially limits one or more major life activities;
 - ii. Has a record of such an impairment; or
 - iii. Is regarded as having such impairment.
- b. For purposes of housing programs, the term does not include any individual who is an alcoholic or drug abuser whose current use of alcohol or drugs prevents the individual from participating in the program or activity in question, or whose participation, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others.

- c. Definitional elements:

“Physical or mental impairment” means any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: immune; normal cell growth; circulatory; neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness; and specific learning disabilities. The term “physical or mental impairment” includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral



palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.

“Major life activities” means functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working, eating, sleeping, standing, lifting, bending, reading, concentrating, thinking, and communicating.

“Has a record of such an impairment” means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

“Is regarded as having an impairment” means has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by a recipient as constituting such a limitation; or has a physical or mental impairment that substantially limits one or more major life activities only as result of the attitudes of others toward such impairment; or has none of the impairments defined in this section but is treated by a recipient as having such an impairment. **24 CFR § 8.3.**

14. Near-elderly Family - A family whose head, spouse, or sole member is a near-elderly person. The term includes two or more near-elderly persons living together, and one or more near-elderly persons living with one or more persons who are determined to be essential to the care or well-being of the near-elderly person or persons. A near-elderly family may include other family members who are not near-elderly. **24 CFR § 5.403.**
15. Near-elderly Person - A person who is at least age 50 but below age 62, who may be a person with a disability. **42 USC 1437a(b)(3).**
16. Person with Disabilities⁵ This is the definition used to determine program eligibility. Under **42 USC § 1437a(b)(3)**, means a person⁶ who:
 - a. Has a disability as defined in Section 223 of the Social Security Act **42 USC 423;**
 - b. Has a physical, mental or emotional impairment that:
 - i. Is expected to be of long continued and indefinite duration;
 - ii. Substantially impedes his/her ability to live independently; and
 - iii. Is of such nature that such disability could be improved by more suitable housing conditions.
 - c. Has a developmental disability as defined in Section 102 (5)(b) of the Developmental Disabilities Assistance and Bill of Rights Act **42 USC § 6001(5).**
17. Qualified Individual with Disabilities, An individual with disabilities who meets the essential eligibility requirements and who can achieve the purpose of the program or activity without modifications in the program or activity that ~~the~~ CHA can demonstrate would result in a fundamental alteration in its nature.

Essential eligibility requirements include stated eligibility requirements such as: income as well as other explicit or implicit requirements inherent in the nature of the program or activity, such as requirements that an occupant of multifamily housing be capable of meeting the recipient’s selection criteria and be capable of complying with all obligations of occupancy with or without supportive services provided by persons other than ~~the~~ CHA. **24 CFR § 8.3.**

⁵ This is the program definition for public housing. The 504 definition does not supersede this definition for eligibility or admission.

⁶ A person with disabilities may be a child.



18. Site-based Waitlists (all) - Lists of applicants based on their preferred location of housing. All current applicants should be given information about each site and an opportunity to select one development or spatially-clustered group of developments where they would accept a unit offer based on their head of household's age- and family size-eligibility. Developments for which site-based waitlists have been established include all of CHA's family, near elderly as well as elderly developments across both public housing and project-based voucher portfolios. Once the initial site-based lists have been established, all applicants will be informed of their estimated wait time and have an opportunity to change their site selection to any other site for which they are age- and family size-eligible. Ranking preferences establish the order of placement on the wait-list but do not guarantee admission; **24 CFR § 903.7(b)(2)**.
19. Senior Designated Site-based Waitlists - Lists available to near elderly and elderly applicants based on their preferred location of housing. All current applicants should be given information about each site and an opportunity to select one development or spatially-clustered group of developments where they would accept a unit offer based on their head of household's age- and family size-eligibility. Once the initial senior designated site-based lists have been established, all applicants will be informed of their estimated wait time and have an opportunity to change their site selection to any other site for which they are age- and family size-eligible. Ranking preferences establish the order of placement on the waitlist but do not guarantee admission; **24 CFR § 903.7(b)(2)**.



V. APPENDICES

APPENDIX A: LIST OF SENIOR DESIGNATED PROPERTIES

The chart below is a list of senior designated properties.

Development Name	Development Address
Ada S. Dennison-McKinley Apts	661 E 69TH ST
Albany Terrace Apts	3030 W 21ST PL
Alfreda Barnett Duster Apts	150 S CAMPBELL AVE
Apartamentos Las Americas	1611 S RACINE AVE
Armour Square Apts & Annex	3120 S WENTWORTH AVE
Armour Square Apts & Annex	3146 S WENTWORTH AVE
Armour Square Apts & Annex	3216 S WENTWORTH AVE
Armour Square Apts & Annex	3250 S WENTWORTH AVE
Blake/Martinez/Wood Apts	2140 N CLARK ST
Blake/Martinez/Wood Apts	2111 N HALSTED ST
Blake/Martinez/Wood Apts	1845 N LARRABEE ST
Bousfield/Richardson-Jones Apts	4930 S LANGLEY AVE
Bousfield/Richardson-Jones Apts	4949 S COTTAGE GROVE AVE
Bridgeport Elderly **	841 W 32ND ST
Britton Budd Apts	501 W SURF ST
Caroline Hedger Apts	6400 N SHERIDAN RD
Castleman/Ella Flagg Young Apts	4645 N SHERIDAN RD
Castleman/Ella Flagg Young Apts	4945 N SHERIDAN RD
Crowder Place Apts	3801 N PINE GROVE AVE
Daniel Hudson Burnham Apts	1930 W LOYOLA AVE
Kenneth Campbell Apts Dr. Mildred C. Harris Apts	6360 S MINERVA AVE
Edith Spurlock Sampson Apts	2640 N SHEFFIELD AVE
Edith Spurlock Sampson Apts	2720 N SHEFFIELD AVE
Elizabeth Davis Apts	440 N DRAKE AVE
Fannie Emanuel Apts	3916 W WASHINGTON BL
Fisher Apts	5821 N BROADWAY ST

RAD1
Mixed Income

* Property not eligible for review associated with vacancy rate trends and lowering eligibility to near elderly.

** Property not eligible for CHA-provided supportive services via Resident Service Coordinators but can access FamilyWorks

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Development Name	Development Address
Flannery Apts	1507 N CLYBOURN AVE
Flannery Apts	1531 N CLYBOURN AVE
Green/Harsh Apts	4227 S OAKENWALD AVE
Green/Harsh Apts	4030 S LAKE PARK AVE
Harry Schneider Apts	1750 W PETERSON AVE
Hattie Callner Apts	855 W ALDINE AVE
Hilliard Senior Phase 1 **	2111 S CLARK ST
Hilliard Senior Phase 2 **	30 W CERMAK RD
Ida Platt Senior Apts	10513-51 S YATES AVE
Ida Platt Senior Apts	2440-54 E 106TH ST
Independence Apts *	4022 N ELSTON AVE
Irene McCoy Gaines Apts	3700 W CONGRESS PKWY
Judge Fisher Apts	5821 N BROADWAY ST
Judge Green/Harsh Apts	4030 S LAKE PARK AVE
Judge Slater Apts & Annex	4218 S COTTAGE GROVE AVE
Judge Slater Apts & Annex	740 E 43RD ST
Kenneth Campbell Apts	6360 S MINERVA AVE
Lidia Pucinska Apts	847 N GREENVIEW AVE
Lidia Pucinska Apts	838 N NOBLE ST
Lincoln Perry Apts and Annex	243 E 32ND ST
Lincoln Perry Apts and Annex	3245 S PRAIRIE AVE
Long Life Apts	344 W 28TH PL
Lorraine Hansberry Apts	5670 W LAKE ST
Mahalia Jackson Apts	9141 S SOUTH CHICAGO AVE
Mahalia Jackson Apts	9177 S SOUTH CHICAGO AVE
Major Lawrence Apts	655 W 65TH ST
Mary Hartwell Catherwood Apts	3920 N CLARK ST

RAD1
Mixed Income

* Property not eligible for review associated with vacancy rate trends and lowering eligibility to near elderly.
** Property not eligible for CHA-provided supportive services via Resident Service Coordinators but can access FamilyWorks

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Development Name	Development Address
Mary Hartwell Catherwood Apts	3930 N CLARK ST
Mary Hartwell Catherwood Apts	3940 N CLARK ST
Minnie Riperton Apts	4250 S PRINCETON AVE
Mulvey Place Apts	416 W BARRY AVE
Northtown Apts *	2410 W PRATT BLVD
Patrick Sullivan Apts	1633 W MADISON ST
Ravenswood Senior Living *	4501 W WINCHESTER AVE
Rosenwald Courts Apartments *, ***	4642 S MICHIGAN AVE
The Kenmore	5040 N KENMORE
The Pomeroy	5650 N KENMORE AVE
Thomas Flannery Apts	1507 N CLYBOURN AVE
Thomas Flannery Apts	1531 N CLYBOURN AVE
Vivian Carter Apts	6401 S YALE AVE
Vivian Gordon Harsh Green/ Harsh Apts	4227 S OAKENWALD AVE
Wicker Park Apts & Annex	1414 N DAMEN AVE
Wicker Park Apts & Annex	2020 W SCHILLER ST
William Jones Apts	1447 S ASHLAND AVE
Zelda Ormes Apts	116 W ELM ST

RAD1
Mixed Income

* Property not eligible for review associated with vacancy rate trends and lowering eligibility to near elderly.
 ** *Property not eligible for CHA-provided supportive services but receives supportive services via Mercy Housing.



APPENDIX B: DEMOGRAPHIC DATA FOR PROPOSED SENIOR DESIGNATED PROPERTIES

The chart below provides demographic data for properties proposed for senior designation in the ~~FY2020-~~
FY2025 Senior Designated Housing Plan.

Senior Housing Demographics as of 9/30/ 19 ²⁴ ³	
Housing Stock & Occupancy	
Total Units	9, 714 ⁶⁸⁸
Occupied Units	8, 915 ⁶⁶⁸
Total Number of Residents	9, 863 ³⁸¹
Average Household Size	1
Unit Size (All Units) **	
0 Bedroom	1, 176 ⁴⁹
1 Bedroom	8, 508 ¹⁵
2 Bedrooms	302 ⁴
3 Bedrooms	0
4 Bedrooms	0
5 Bedrooms	0
6 Bedrooms	0
7+ Bedrooms	0
Gender (All Residents)	
Female	4, 908 ⁵⁹³
Male	4, 953 ⁷⁸⁸
Age (All Residents)	
0-17	113
18-54	143 ⁵⁹
55-61	414 ²⁹³
62 and over	9, 293 ⁰²⁶
Race & Ethnicity (All Residents)	
African American, non-Hispanic	5, 442 ²⁹⁷
Asian, non-Hispanic	1, 620 ⁶⁶⁴
White, non-Hispanic	1, 616 ³⁸⁴
Hispanic, any race	1, 076 ⁰¹¹
Native Hawaiian/Other Pacific Islander, non-Hispanic	424 ⁶
American Indian/Alaska Native, non-Hispanic	35 ²⁵
Other/Unknown Race	25 ²²

*Includes all Senior PH and RAD1 units

**Includes 60 units in use for administrative or resident activity functions

³ Demographic information is from CHA's Yardi database. Demographics in the Yardi database may contain inconsistencies due to data conversion and data entry.



APPENDIX C: LEASING DATA FOR SENIOR DESIGNATED PROPERTIES

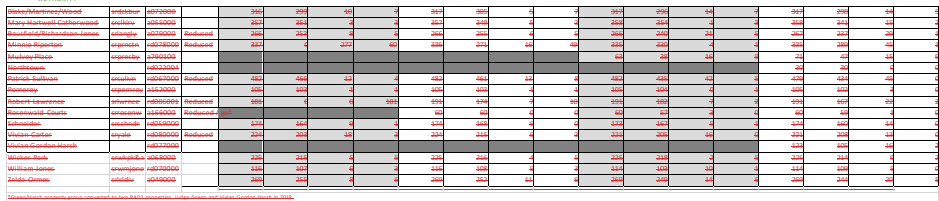
Property Information			Year End 2020				Year End 2021				Year End 2022				Year End 2023				Year End 2024			
Agency	Program*	Development Type	Total Units	Occupied Units	Vacant Units	Non-Dwelling Units	Total Units	Occupied Units	Vacant Units	Non-Dwelling Units	Total Units	Occupied Units	Vacant Units	Non-Dwelling Units	Total Units	Occupied Units	Vacant Units	Non-Dwelling Units	Total Units	Occupied Units	Vacant Units	Non-Dwelling Units
Ada S. Demmon-McKinley	Public Housing	Senior	125	108	7	2	125	113	6	2	125	109	14	2	125	117	4	2	125	111	4	2
Albany Terrace	RAD-PBV	Senior	350	218	30	5	350	228	38	5	350	183	82	6	349	168	116	6	350	164	133	6
Alfred Barnett Dwyer	Public Housing	Senior	129	121	2	3	129	119	7	3	129	121	5	3	129	122	2	3	129	121	3	3
Armour Sq	Public Housing	Senior	392	350	7	14	392	358	20	14	392	357	21	14	392	360	7	14	392	366	2	14
Britton Budd	Public Housing	Senior-Mixed	173	168	5	0	173	171	2	0	173	169	4	0	173	169	4	0	173	171	2	0
Caroline Hedger	RAD-PBV	Senior	450	431	18	1	450	431	18	1	450	436	13	1	450	438	11	1	450	434	15	1
Daniel Hudson Burnham	RAD-PBV	Senior	178	174	4	0	178	170	8	0	178	176	2	0	178	174	4	0	178	170	8	0
Dr. Mildred C. Harris Apt.	RAD-PBV	Senior	165	140	6	0	165	147	15	0	165	147	17	0	165	147	17	0	165	147	17	0
Edith Spurlock Sampson	RAD-PBV	Senior	394	328	57	8	394	290	96	7	395	250	137	7	405	268	34	4	405	303	91	0
Elizabeth Davis	RAD-PBV	Senior	148	126	4	0	148	108	23	0	148	101	46	0	148	96	9	0	148	90	58	0
Ella Flag Young	Public Housing	Senior	436	398	35	0	436	400	33	1	436	396	36	1	437	400	11	2	437	394	20	1
Fannie Emanuel	RAD-PBV	Senior	181	174	6	1	181	178	2	1	181	164	16	1	181	175	5	1	181	170	10	1
Hattie Calmer	RAD-PBV	Senior	146	141	2	2	146	136	8	2	146	141	2	2	146	141	5	0	146	137	9	0
Hillard Senior-Holsten P1	Public Housing	Senior-Mixed	94	93	1	0	94	88	6	0	94	84	10	0	94	93	1	0	94	93	1	0
Hillard Senior-Holsten P2	Public Housing	Senior-Mixed	94	93	1	0	94	92	2	0	94	91	3	0	94	93	1	0	94	93	0	0
Independence Apts & Library	RAD-PBV	Senior	30	30	0	0	30	30	0	0	30	30	0	0	30	30	0	0	30	30	0	0
Irene McCoy Gaines	RAD-PBV	Senior	151	97	7	2	151	96	14	2	151	85	25	2	152	69	42	2	150	111	33	1
Judge Fisher	RAD-PBV	Senior	197	189	8	0	197	194	3	0	197	188	8	0	197	193	4	0	197	194	3	0
Judge Green	RAD-PBV	Senior	153	128	14	1	153	138	14	1	153	125	26	2	153	132	19	2	153	142	8	2
Judge Slater	RAD-PBV	Senior	402	245	50	0	402	383	19	0	402	361	41	0	402	365	37	0	402	351	51	0
Kennore	Public Housing	Senior-Mixed	100	100	0	0	100	99	1	0	100	99	1	0	100	96	4	0	100	92	8	0
Las Americas	RAD-PBV	Senior	211	188	15	2	211	171	12	2	211	177	32	2	211	187	22	2	211	192	17	2
Lida Pucinski	Public Housing	Senior	380	366	12	1	378	369	7	1	378	351	25	1	379	354	11	2	379	359	6	1
Lincoln Perry Apts.	RAD-PBV	Senior	442	359	69	0	442	385	37	0	442	373	69	0	442	390	51	0	442	397	44	0
Long Life	RAD-PBV	Senior	114	108	0	1	114	109	4	1	113	113	0	0	113	112	1	0	113	113	0	0
Lorraine Hansberry	RAD-PBV	Senior	166	135	5	0	166	122	24	0	167	132	32	0	166	158	8	0	166	160	6	0
Mahalia Jackson	Public Housing	Senior	282	239	24	3	282	248	31	3	282	261	18	3	282	253	18	3	282	244	11	3
Major Robert Lawrence	RAD-PBV	Senior	191	169	11	0	191	182	7	0	191	180	9	0	191	185	4	0	191	188	1	0
Maria Martinez	Public Housing	Senior	317	293	15	5	317	296	15	5	317	284	28	5	317	253	22	5	317	257	10	5
Mary Hartwell Catherine	Public Housing	Senior	358	338	18	2	358	349	7	2	358	337	19	2	358	339	13	2	358	341	9	2
Mary Jane Richardson-Jones	RAD-PBV	Senior	268	229	16	1	267	237	23	1	267	245	20	1	267	237	12	1	267	217	3	1
Minnie Riperton	RAD-PBV	Senior	335	281	35	0	335	295	37	0	335	285	50	0	335	321	14	0	335	306	29	0
Northtown Apts & Library	RAD-PBV	Senior	30	29	1	0	30	29	1	0	30	30	0	0	30	30	0	0	30	30	0	0
Patrick Sullivan	RAD-PBV	Senior	479	407	22	0	479	408	34	0	479	371	92	0	479	401	78	0	479	387	92	0
Pennery	Public Housing	Senior-Mixed	105	103	2	0	105	100	5	0	105	100	5	0	105	100	4	1	105	98	6	1
Ravenwood Senior Living	RAD-PBV	Senior	74	74	0	0	74	74	0	0	74	74	0	0	74	73	1	0	74	74	0	0
Rosewald Courts Apt	Public Housing	Senior-Mixed	61	57	4	0	60	59	1	0	60	57	3	0	60	59	1	0	60	60	0	0
Schneider	RAD-PBV	Senior	175	161	8	0	175	144	30	0	175	140	30	5	175	162	11	2	175	156	17	2
Thomas Flannery	Public Housing	Senior	252	219	9	1	252	220	18	1	252	225	26	1	252	232	2	1	252	227	5	1
Vivian Carter	RAD-PBV	Senior	221	189	12	0	221	203	18	0	221	203	18	0	221	198	23	0	221	208	13	0
Vivian Gordon Harsh	RAD-PBV	Senior	123	103	7	1	123	107	9	1	123	114	8	1	123	118	4	1	123	109	13	1
Wicker Park	Public Housing	Senior	225	202	10	2	225	210	3	2	225	210	21	2	225	210	7	2	225	214	3	2
William Jones	RAD-PBV	Senior	114	110	1	0	114	110	4	0	114	102	12	0	114	102	12	0	114	102	12	0
Zelda Ormes	Public Housing	Senior	269	234	10	6	269	246	11	6	269	249	14	6	269	250	6	6	269	243	4	6

*Program as of year end 2024.

*Program as of year end 2024.

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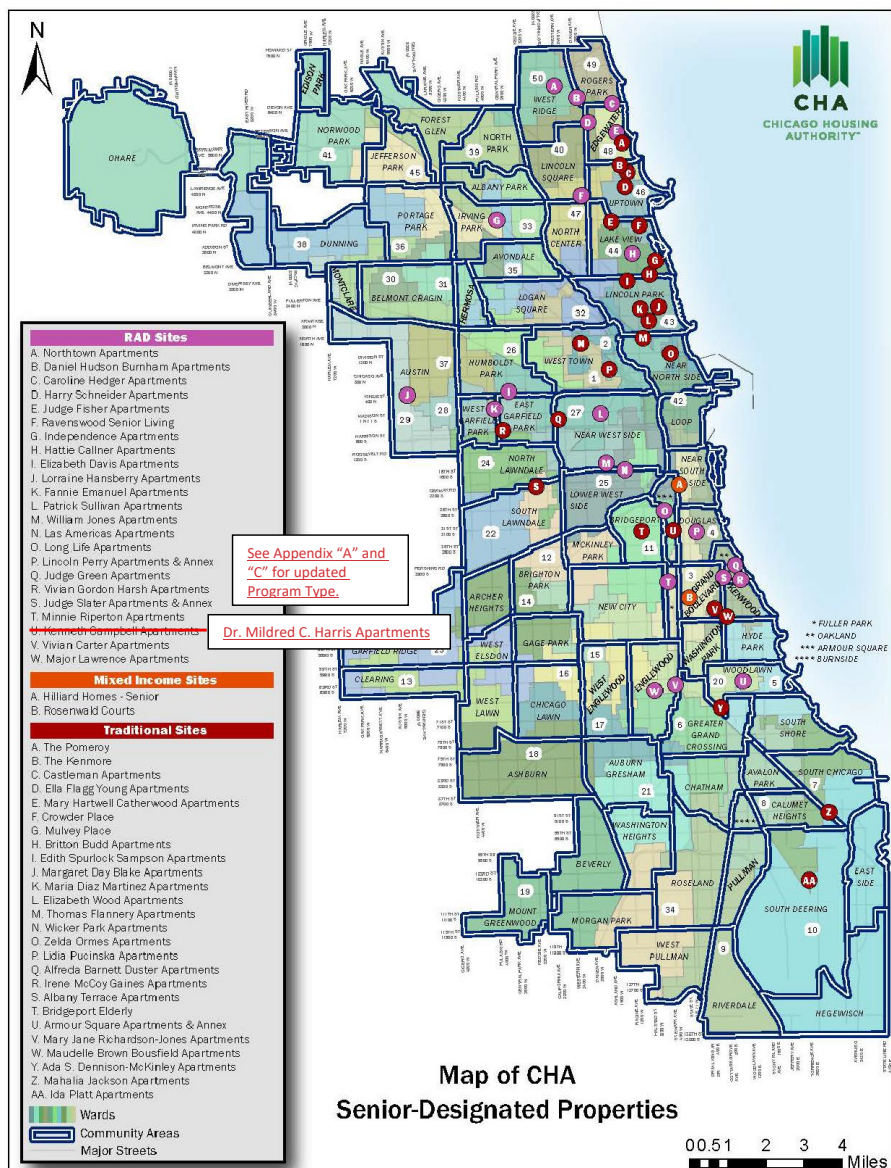
Senior Designated Property	HHS-Based Waiver Code	Program Code	Resident Age 2024	2020			2021			2022			2023			2024		
				Total Units	Occupied Units	Vacant Units	Total Units	Occupied Units	Vacant Units	Total Units	Occupied Units	Vacant Units	Total Units	Occupied Units	Vacant Units	Total Units	Occupied Units	Vacant Units
Adams-McIntire	ADMS0000	Residential	2024	125	108	7	125	113	6	125	109	14	125	117	4	125	114	6
Albany Terrace	ALBA0000	Residential	2024	350	218	30	350	228	38	350	183	82	349	168	116	350	164	133
Alfred Bennett Dwyer	ALFD0000	Residential	2024	129	121	2	129	119	7	129	121	5	129	122	2	129	121	3
Armour Square	ARMO0000	Residential	2024	392	350	7	392	358	20	392	357	21	392	360	7	392	366	2
Britton Budd	BRIT0000	Residential	2024	173	168	5	173	171	2	173	169	4	173	169	4	173	171	2
Caroline Hedger	CARH0000	Residential	2024	450	431	18	450	431	18	450	436	13	450	438	11	450	434	15
Daniel Hudson Burnham	DHUB0000	Residential	2024	178	174	4	178	170	8	178	176	2	178	174	4	178	170	8
Dr. Mildred C. Harris Apt.	DRMC0000	Residential	2024	165	140	6	165	147	15	165	147	17	165	150	14	165	147	17
Edith Spurlock Sampson	ESPS0000	Residential	2024	394	328	57	394	290	96	395	250	137	405	268	34	405	303	91
Elizabeth Davis	ELDA0000	Residential	2024	148	126	4	148	108	23	148	103	29	148	96	9	148	90	58
Ella Flag Young	ELLA0000	Residential	2024	436	398	35	436	400	33	436	396	36	437	400	11	437	394	20
Fannie Emanuel	FANN0000	Residential	2024	181	174	6	181	178	2	181	164	16	181	175	5	181	170	10
Hattie Cabier	HATC0000	Residential	2024	146	141	2	146	136	8	146	141	2	146	141	5	146	137	9
Willard Senior-Holsten P1	WHS10000	Residential	2024	94	93	1	94	93	1	94	93	1	94	93	1	94	93	1
Willard Senior-Holsten P2	WHS20000	Residential	2024	94	93	1	94	92	2	94	91	3	94	93	1	94	93	0
Independence Apts. & Library	INDA0000	Residential	2024	30	30	0	30	30	0	30	30	0	30	30	0	30	30	0
Irene McCoy Gaines	IRMG0000	Residential	2024	151	97	7	151	96	14	151	85	25	152	69	42	150	111	33
Judge Fisher	JUFI0000	Residential	2024	197	189	8	197	194	3	197	188	8	197	189	8	197	194	3
Judge Green	JUGR0000	Residential	2024	153	127	9	153	138	14	153	125	26	153	132	19	153	142	9
Judge Slater	JUSL0000	Residential	2024	402	245	50	402	383	19	402	361	41	402	365	37	402	351	51
Kennore	KENR0000	Residential	2024	100	100	0	100	99	1	100	99	1	100	96	4	100	92	8
Las Americas	LASA0000	Residential	2024	211	188	15	211	171	12	211	177	32	211	187	22	211	192	17
Lida Pucinski	LIDP0000	Residential	2024	380	366	12	378	369	7	378	351	25	379	354	11	379	359	6
Lincoln Perry Apts.	LIPR0000	Residential	2024	442	359	69	442	385	37	442	373	69	442	390	51	442	397	44
Long Life	LONG0000	Residential	2024	114	108	0	114	109	4	113	113	0	113	112	1	113	113	0
Lorraine Hansberry	LORH0000	Residential	2024	166	135	5	166	122	24	167	132	32	166	158	8	166	150	20
Marionette Williams	MARI0000	Residential	2024	121	91	2	121	92	25	121	92	25	121	92	25	121	92	25







APPENDIX D: MAP OF CHA SENIOR DESIGNATED PROPERTIES



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